IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

L. Lin Wood, Jr.,

Plaintiff,

v.

CIVIL ACTION FILE NO. 1:20-cv-04651-SDG

Brad Raffensperger, in his official capacity as Secretary of the State of Georgia, et al.,

Defendants.

AFFIDAVIT OF DORIS SUMNER

Personally appeared before me, the undersigned subscribing officer, duly authorized to administer oaths, DORIS SUMNER, who being duly sworn, deposed and stated as follows:

- 1. My name is DORIS SUMNER. I am over 18 years of age, a citizen of the State of Georgia, suffer from no legal disabilities, and am otherwise competent to testify to the matters contained herein. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
 - 2. I am a resident of and registered elector in Gwinnett County, Georgia.
- 3. On November 13, 14, and 15, 2020, I was present as an observer credentialed by the Democratic Party of Georgia to observe the statewide hand

recount of ballots cast in the 2020 Presidential Election in Gwinnett County, Georgia (the "Recount").

- 4. I arrived at 455 Grayson Highway, Lawrenceville, GA 30046, where the Recount was held, at approximately 1:00 p.m. on November 13 and approximately 8:00 a.m. on November 14 and 15. I had no difficulty accessing the space in which the Recount was held on any of these days.
- 5. Throughout my time observing the Recount, there were many more GOP-credentialed observers than DPG-credentialed observers. At no time did I see or hear of a credentialed observer being denied access to the Recount.
- 6. When I first began observing on November 13, GOP-credentialed observers stationed themselves close to or in the personal space of the audit teams. By November 15, these observers had stopped getting so close to the audit teams.
- 7. In all but a few instances, the auditing teams counted ballots aloud, with both members of each audit team examining the ballot. The few times that didn't occur, a credentialed observer would notify a county elections official and the election official would promptly correct the auditors.
- 8. From what I observed, the election officials secured ballots well. I never saw any unattended ballots. There was always an elections worker present around any of the plastic black boxes (for absentee ballots) and blue security bags

(for election day ballots) used to store and organize the batches of ballots being counted.

- 9. I saw no unauthorized party handling ballots at any point.
- 10. Based on my personal observations over three days, I have no concerns about Gwinnett County's ability to count, control, and keep secure the voted ballots examined in the Recount.
- 11. The Recount process seemed like a professional operation each day I observed.
- 12. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 13. I declare under penalty of perjury that the foregoing is true and correct to the best of my ability.

Case 1:20-cv-04651-SDG Document 38-4 Filed 11/19/20 Page 4 of 4 observed. 12. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward. 13. I declare under penalty of perjury that the foregoing is true and correct to the best of my ability. Executed this | Clay of November 2020 OND W. Dumner DORIS SUMMER Swom to and subscribed to before me this Bday of

November 2020.

Notary Public

My commission express March 78,202

CHICAGO STATES

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